

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

**ORDER GRANTING FIVE HUNDRED TWENTY-FIFTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT  
OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR  
WHICH THE DEBTORS ARE NOT LIABLE**

Upon the *Five Hundred Twenty-Fifth Omnibus Objection (Substantive) of the  
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the  
Commonwealth of Puerto Rico to Claims for which the Debtors Are Not Liable* [ECF No. 22258]  
(the “Five Hundred Twenty-Fifth Omnibus Objection”)<sup>2</sup> of the Commonwealth of Puerto Rico

<sup>1</sup> The Debtors in the Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Twenty-Fifth Omnibus Objection.

(the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated September 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Five Hundred Twenty-Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Twenty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Twenty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Twenty-Fifth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which neither the Commonwealth nor any other Title III debtor is liable; and the Court having determined that the relief sought in the Five Hundred Twenty-Fifth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Twenty-Fifth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Twenty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22258 in Case No. 17-3283;  
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters  
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Twenty-Fifth Omnibus Objection**

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALICEA COLON, LILLIAM I. PO BOX 285 PUNTA SANTIAGO, PR 00741	06/28/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	137384	\$57,807.07*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						
Claim #137384 also contained on Exhibit A to the 337th Omnibus Claims Objection for Reclassified Claims.						
2	BALBIN PADILLA, CYNTHIA EB-5 CALLE TILO URB. LOS ALMENDROS BAYAMON, PR 00961	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	154211	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho. Claim #154211 also contained on Exhibit A to the 524th Omnibus Claims Objection for Disallowed Claims.						
3	BARBOSO AYALA, MARILYN N HC 3 BOX 10368 SAN GERMAN, PR 00683	05/09/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	12567	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations.						
Claim #12567 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
4	HEREDIA CRUZ, MARIA M RR 7 BOX 6956 SAN JUAN, PR 00926	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	30335	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho. Claim #30335 also contained on Exhibit A to the 526th Omnibus Claims Objection for Disallowed Claims.						
5	HERNANDEZ ROSADO, SECUNDINO 2 CALLE BRISAS DEL MAR AGUADA, PR 00602	05/14/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	14843	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations.						
Claim #14843 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						
6	LEBRON FLORES, AMANLYS URB. VILLA ANA CALLE ROBERTO MOJICA D-15 JUNCOS, PR 00777	05/22/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	24607	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Rodriguez"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colon. Because this objection does not constitute an objection to the other portion of the claim, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
Claim #24607 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims.						

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
7	MARRERO, ENID OCASIO PO BOX 1464 COROZAL, PR 00783	05/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18276	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
Claim #18276 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						
8	MARTINEZ SERRANO, MARIA PO BOX 552 JUANA DIAZ, PR 00795	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	36540	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho. Claim #36540 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims and the 526th Omnibus Claims Objection for Disallowed Claims.						
9	MARTINEZ SERRANO, MARIA M. PO BOX 552 JUANA DIAZ, PR 00795	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	38520	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho. Claim #38520 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims and the 526th Omnibus Claims Objection for Disallowed Claims.						



Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
10	MARTY TROCHE, HIRAM L 48 CALLE SALVADOR BRAU CABO ROJO, PR 00623	04/16/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	7442	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 30851 and 104175, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Pérez Colón. Because this objection does not constitute an objection to the other portion of the claim, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
Claim #7442 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						
11	MENDEZ LARACUENTE, RAMON 61 CALLE MENDEZ VIGO APARTAMENTO 5 PONCE, PR 00730	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	14449	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón. Claim #14449 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims, the 524th Omnibus Claims Objection for Disallowed Claims and the 526th Omnibus Claims Objection for Disallowed Claims.						
12	MENDEZ LARACUENTE, RAMON 61 CALLE MENDEZ VIGO APARTAMENTO 5 PONCE, PR 00730	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18494	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón. Claim #18494 also contained on Exhibit A to the 524th Omnibus Claims Objection for Disallowed Claims and the 526th Omnibus Claims Objection for Disallowed Claims.						

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
13	QUINONES MALDONADO, CARMEN D. URB JARDS DE COUNTRY CLUB CJ28 CALLE 147 CAROLINA, PR 00983	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	24924	\$90,908.16*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón. Claim #24924 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims and the 524th Omnibus Claims Objection for Disallowed Claims.						
14	RAMOS RODRIGUEZ, DIANA E. URB BRISAS DEL PRADO 1730 CALLE GARZA SANTA ISABEL, PR 00757-2563	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	122250-2	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 50221 and 104127, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Abrams Diaz. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
15	RIVERA IRIZARRY, MARIA URB LOS REYES 91 CALLE BELEN JUANA DIAZ, PR 00795	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	33588	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho. Claim #33588 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims and the 526th Omnibus Claims Objection for Disallowed Claims.						

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
16	RODRIGUEZ RAMOS, MIGDALIA PMB 249 PO BOX 1810 MAYAGUEZ, PR 00681	05/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25257	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations. Claim #25257 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						
17	RODRIGUEZ RODRIGUEZ, SONIA PO BOX 1604 JUANA DIAZ, PR 00795-5501	05/23/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	36686	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón. Claim #36686 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims and the 524th Omnibus Claims Objection for Disallowed Claims.						
18	SANTIAGO RENTA, ANAIDA M HC 5 BOX 5624 JUANA DIAZ, PR 00795	05/17/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	14659	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón. Claim #14659 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims and the 524th Omnibus Claims Objection for Disallowed Claims.						

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
19	SANTIAGO RENTA, ANAIDA M HC 5 BOX 5624 JUANA DIAZ, PR 00795	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	15717	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 (“Acevedo Camacho”) and Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 (“Beltrán Cintrón”). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Acevedo Camacho and Beltrán Cintrón litigations. Claim #15717 also contained on Exhibit A to the 526th Omnibus Claims Objection for Disallowed Claims.						
20	SANTIAGO RODRIGUEZ, SERAFIN JARDIROS D-8 CALLE 6 SANTA ISABOL, PR 00757	06/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	47370	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 (“Maldonado Rodriguez”). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colon. Because this objection does not constitute an objection to the other portion of the claim, the Debtors’ reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
21	SANTIAGO SOTO, VIVIAN BOX 418 SANTA ISABEL, PR 00757	04/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	5863	\$8.00*
Reason: Claim purports to assert liabilities associated with the litigation captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 (“Pérez Colón”). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 30851 and 104175, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Pérez Colón.						
Claim #5863 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
22	SANTIAGO VIENTOS, JOSE A HC 02 BOX 11203 LAS MARIAS, PR 00670	04/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	7311	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations.						
Claim #7311 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						
23	SILVA BERNIER, JOSE V. P.O. BOX 1703 GUAYAMA, PR 00785	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	70744	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations. Because this objection does not constitute an objection to the other portion of the claim, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
24	TORRES LOPEZ, IVETTE G URB. BRISAS DEL PRADO BOX 2008 SANTA ISABEL, PR 00757	05/17/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	13765	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho") and Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Acevedo Camacho and Beltrán Cintrón litigations. Claim #13765 also contained on Exhibit A to the 367th Omnibus Claims Objection for Reclassified Claims and the 526th Omnibus Claims Objection for Disallowed Claims.						

Five Hundred Twenty-Fifth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
25	TORRES LOPEZ, IVETTE G URB. BRISAS DEL PRADO BOX 2008 SANTA ISABEL, PR 00757	05/17/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	13935	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho") and Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Acevedo Camacho and Beltrán Cintrón litigations. Claim #13935 also contained on Exhibit A to the 526th Omnibus Claims Objection for Disallowed Claims.						
26	VAZQUEZ PAREDES, NEIZA H PO BOX 1754 YABUCOA, PR 00767	07/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	111363	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
27	VELAZQUEZ LUCIANO, KEYLA M #76 URB. ALTURAS SABANERAS SABANA GRANDE, PR 00637-1603	06/06/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	66761	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigations captioned Juan Pérez Colón et al. v. Puerto Rico Department of Transportation & Public Works, Case No. KAC1990-0487 ("Pérez Colón") and Jeannette Abrams Diaz et al. v. Department of Transportation & Public Works, Case No. KAC-2005-5021 ("Abrams Diaz"). However, based on documentation submitted by the attorneys representing all plaintiffs in those litigations, Claimant is not a named plaintiff in either litigation, and there is therefore no basis for Claimant to assert liabilities associated with either litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in either litigation, the claim would be duplicative of the master proofs of claim filed on behalf of all plaintiffs associated with the Pérez Colón and Abrams Diaz litigations.						
Claim #66761 also contained on Exhibit A to the 351st Omnibus Claims Objection for Partially Disallowed Claims.						
TOTAL						\$148,723.23*